

MELINDA HAAG (CSBN 132712)
United States Attorney

MIRANDA KANE (CABN 150630)
Chief, Criminal Division

ADAM A. REEVES (NYSB 2363877)
Assistant United States Attorney

450 Golden Gate Avenue, Box 36055
San Francisco, California 94102
Telephone: (415) 436-7157
Facsimile: (415) 436-7234
Adam.Reeves@usdoj.gov

Attorneys for Plaintiff
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. CR 09 – 0417 EMC
)	
Plaintiff,)	STIPULATION AND
)	[PROPOSED] ORDER
v.)	
)	
MAHER FAYEZ KARA, and)	
MOUNIR FAYEZ KARA)	
(also known as MICHAEL F. KARA),)	
)	
Defendants.)	

WHEREAS, on July 6, 2011, Maher Kara pled guilty and agreed to cooperate with the government's ongoing insider trading investigation;

WHEREAS, on July 13, 2011, Mounir Kara pled guilty and agreed to cooperate with the government's ongoing insider trading investigation;

WHEREAS, on September 1, 2011, Bassam Yacoub Salman was indicted on charges related to this insider trading scheme;

WHEREAS, on May 9, 2012, the Court scheduled trial in *United States v. Salman* to begin on March 4, 2013;

1 WHEREAS, the parties (1) now anticipate that Maher Kara and Mounir Kara will both be
2 witnesses for the government in the upcoming trial pursuant to their respective cooperation
3 agreements; (2) request that the sentencing hearings for their respective cases be adjourned until
4 after the March 4, 2013 trial so they may complete their cooperation; and (3) request that the
5 status conference in these cases therefore be postponed to a date that is convenient for the Court
6 in December 2012.

7 THEREFORE, it is hereby stipulated by and between the parties, through their respective
8 counsel of record, that the time from July 20, 2011 to a date that is convenient for the Court in
9 December 2012 shall be excluded in computing the time within which the trial of the offense
10 alleged in the Indictment must commence under Title 18, United States Code, Section 3161 for
11 defendants Maher Kara and Mounir Kara.

12 DATED: June 19, 2012

MELINDA HAAG
United States Attorney

/s/

Adam A. Reeves
Assistant United States Attorney

/s/

17 DATED: June 19, 2012

Carl H. Loewenson, Jr.
George C. Harris, Esq.
MORRISON & FOERSTER, LLP
Counsel for Maher Kara

/s/

21 DATED: June 19, 2012

Miles Ehrlich, Esq.
Ismail Ramsey, Esq.
RAMSEY & EHRLICH LLP
Counsel for Mounir Kara

1 On the basis of material submitted to the Court,

2 **IT IS HEREBY ORDERED** that:

3 The ends of justice are served by finding that a continuance of the status hearing for
4 defendants Maher Kara and Mounir Kara from June 20, 2012 to December 12, 2012 outweighs
5 the best interests of the public and the defendants in a speedy trial and the prompt disposition of
6 criminal cases and the Court concludes that the exclusion of time from June 20, 2012 to
7 December 12, 2012 should be made under Title 18, United States Code, Sections
8 3161(h)(7)(B)(iv).

9 **DATED:** June 20, 2012

